



**CERTIFICATE OF COMPLIANCE**

No. 17-2

UNITED STATES OF AMERICA,

*Petitioner,*

v.

MICROSOFT CORPORATION,

*Respondent.*

As required by Supreme Court Rule 33.1(h), I certify that the Brief of International and Extraterritorial Law Scholars as Amici Curiae in Support of Respondent contains 8,985 words, excluding the parts of the Brief that are exempted by Supreme Court Rule 33.1(d).

I declare under penalty of perjury that the foregoing is true and correct.

Executed on January 18, 2018.

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Sworn to and subscribed before me by said Affiant  
on the date designated below.

Date: January 18, 2018

John D. Gallagher  
Notary Public

[seal]



JOHN D. GALLAGHER  
Notary Public, State of Ohio  
My Commission Expires  
February 14, 2018